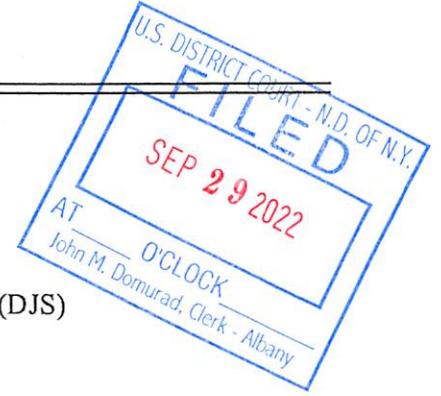


AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT
for the
Northern District of New York

UNITED STATES OF AMERICA)	v.	Case No. 1:22-MJ- <i>562</i> (DJS)
JONATHAN WOODWORTH)		
)		
)		
)		
Defendant)		



CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the dates of June 23, 2022 through September 29, 2022 in the counties of Albany and Rensselaer in the Northern District of New York, the defendant violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C § 2422(b)	Attempted Enticement of a Minor

This criminal complaint is based on these facts:
SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.

FBI TFO	
<i>Complainant's signature</i>	
FBI TFO Michelle Crandall	
<i>Printed name and title</i>	

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: 9/29/2022

	<i>Judge's signature</i>
Hon. Daniel J. Stewart, U.S. Magistrate Judge	
<i>Printed name and title</i>	

City and State: Albany, New York

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Michelle Crandall, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI) and have been since November 2018. I have been a member of the Rotterdam Police Department since July of 2013 and an Investigator since September of 2016. In that capacity, I assist with sexually based offenses and computer crimes. I am assigned to the Albany Field Office, New York. I am currently assigned to investigate federal violations concerning child pornography and the sexual exploitation of children. I have gained experience regarding such crimes through training in seminars, classes, and everyday work related to conducting these types of investigations.

2. I am an investigative or law enforcement officer of the United States within the meaning of Title 18 United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516(1). As an FBI Task Force Officer, I am authorized to seek and execute federal arrest and search warrants for Title 18 criminal offenses, including offenses related to the sexual exploitation of minors, specifically those involving the exploitation of a minor for sexual purposes in violation of Title 18, United States Code, Section 2422(b).

3. I make this affidavit in support of a criminal complaint and arrest warrant charging Jonathan Woodworth (“WOODWORTH”), with using a facility of interstate commerce to attempt

to persuade, induce, entice, and coerce an individual who has not attained the age of 18 years, to engage in sexual activity for which any person can be charged with a criminal offense, in violation of Title 18 United States Code, Section 2422(b).

4. The statements contained in this affidavit are based upon my investigation, information provided by other law enforcement officials and on my experience and training as a Task Force Officer with the FBI. As this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that WOODWORTH has violated Title 18, United States Code, Section 2422(b).

Details of the Investigation

5. On or about January 19, 2022 a law enforcement officer acting in an undercover capacity (hereinafter, “UC”) maintained a profile on Application A- an internet-based, adult-oriented social networking service - as an adult female foster mother. The UC’s profile read, “Foster mom who is looking for some help from someone who is kind and caring.”

6. On or about June 16, 2022, an Application A user named “knot_smith” initiated a conversation with the UC stating among other things, “What I want: To share depraved thoughts on parenting. I want someone real that isn’t going to flake when the conversation gets really good. I’m also soon to be divorced, and need an outlet. Taboo subjects are what makes me feel alive.” The UC responded stating “lookin 4 some male guidance in some areas and to mentor her like” and “She’s 10 and we can def discuss her background more.” Thereafter, the UC and user

“knot_smith” agreed to continue their conversation on Application B, an internet-based instant messaging application.

7. During conversations between the UC and Application B user “bunderberry,” the UC identified herself as a foster parent attempting to arrange for an adult male to have sexual contact with her 10 year-old foster daughter “Kylie.” Application B user “bunderberry” identified himself as “John” and law enforcement later identified the user as WOODWORTH by utilizing a facial recognition service to compare the images of the male that were sent to the UC on Application B and social media images. This resulted in a possible identification based on the three public profiles. The profiles were reviewed and confirmed that the images used in the profiles matched the images sent to the UC.

8. During messages between the UC and WOODWORTH, WOODWORTH acknowledged that he believed he was messaging the foster mother of a 10-year-old girl (“Kylie”) and outlined various sex acts WOODWORTH intended to engage in with “Kylie.” Examples of these messages exchanged between WOODWORTH and the UC are provided below:

- a. On June 15, 2022, WOODWORTH sent messages stating “I would love to have you right there next to us and even help if you feel like you’re comfortable with it” and “I am so curious to know what she’s like. Her appearance... her personality... and how she feels when her soaked lips wrap tightly around me.” The UC responded stating “jus the basis stuff like how cute guys r or like who she has a crush on n talks about them but say they dont like her and bla blah bklah. ive told her guys her age are silly anyways and u can only rlly trust older one.” WOODWORTH responded stating “I love how you are grooming her. It is soo

exciting to know you're getting her ready" and "I want you to know that I wouldnt hesitate to fill her with cum again and again. I find that especially exciting because her period is so close ❤️❤️."

- b. On June 17, 2022, WOODWORTH stated "Straight child sex is very exciting to watch. I'm fine if my cock doesnt fit right away... the process of stretching her gently and letting her body decide when to take me in further will probably make me cum just as fast" and on June 24, 2022, WOODWORTH stated to the UC "I'm not going to hurt her. I take pleasure in watching her pull me in. I'll stretch her very gradually... she's going to make me fit all on her own lol."
- c. On August 18, 2022, at WOODWORTH's request, the UC sent WOODWORTH a photo of "Kylie" through Application B. WOODWORTH responded stating "She is gorgeous," "I want her to grab my hair and pull me into her slit as I lick until she squirts" and "I wanna see what her body looks like top to bottom... and her backside :)."

9. In subsequent Application B messages, WOODWORTH indicated he wanted to help the UC "groom" "Kylie." On September 26, 2022, WOODWORTH stated "Im positive I can help you groom Ky :)" and "Ive been thinking of sending some porn . I know where to find animated porn, that looks realistic, with girls her age. I can also send gifs and pics of adults. If you want real porn with girls her age, I can find that too ;)."

10. WOODWORTH further indicated in messages with the UC that WOODWORTH would be willing to pay the UC \$100 for allowing WOODWORTH to engage in sex acts with "Kylie." Specifically, the following conversation took place, in pertinent part:

UC: Tbh what I get is to see it all happen and not trying to sound like a total douche canoe, but if she's good maybe we can arrange a tip for me lol

WOODWORTH: What kind of tip lol
I mean if shes good. Of course!

UC: Lol I was thinking a monetary amount ..ugh kinda sound like a scumbag b
ut bills are bills I supposeeeee

WOODWORTH: How much would you want?

UC: Nothing insane. Life is hard and tbh I actually like trust that u really are kind. 100 bucks? Anything more would be like a tip for her lol
But if u aren't for it I totally get it

WOODWORTH: I like the way you are up front. And I also like that I can reward her :)
dont mind at all :)

11. In subsequent messages, WOODWORTH and the UC discussed WOODWORTH traveling from Canada to Albany, New York for WOODWORTH to engage in sex acts with "Kylie:"

- a. On September 9, 2022, WOODWORTH stated "Ky is priceless and Im going to treat her like gold! This is happening!! Doing this under the watchful eye of a girl's mom has been my dream for decades. I wanna let you see it all ❤️. I am blessed to have this opportunity. Im going to give her an experience she will always want to remember fondly."

b. On September 15, 2022, WOODWORTH sent the UC a message with a screenshot of a flight itinerary from YQM (Greater Moncton Roméo LeBlanc International Airport) to EWR (Newark International Airport) and stated “I have a ticket for the 28th.” WOODWORTH further stated “Also, I found a fun cabin that Id like to stay in. its in Potsdam NY” and sent a screenshot of the reservation for that accommodation.





- c. On September 19, 2022, WOODWORTH sent the UC a screenshot of a train ticket reservation to Albany, New York and remarked “Its official!”



☺+ ★ 11:24 PM (SD)

WOODWORTH further stated to the UC when discussing the accommodations WOODWORTH reserved, “ah beautiful spot to try and see how much can fit...gonna be such a fun learning exp,,shes gonna love it...all the tingles n feel goods.”

12. On September 26, 2022, WOODWORTH sent messages to the UC confirming his intention to travel to Albany, New York to engage in sex acts with “Kylie.” WOODWORTH stated “This is crazy... and Im all in” and “Just wanna know you and Ky want this too.” The UC responded stating “We are all in too..can’t believe it but can’t wait to see her b taught how she should rly b treated ya know?” WOODWORTH responded stating “By treated... You mean groomed into a lil sex worker? Lol I wanna touch her so much.” WOODWORTH went on to state “I cant wait to lose count of how many times I cum inside her ❤️” and “I want her to take all my loads without any worry. She's at a perfect age for this kind of mentoring.”

13. On September 28, 2022, WOODWORTH arrived at the Albany-Rensselaer Amtrak Station and engaged with the UC. WOODWORTH was subsequently taken into custody after exiting the train station. In a post-Miranda interview, WOODWORTH stated, in sum and substance, that he had planned on having sexual intercourse or oral sex if the minor was willing to do so; that he did bring lube with him; and that he did tell the UC that he would give a monetary “tip” and that he was going to get American cash out in Potsdam, NY.

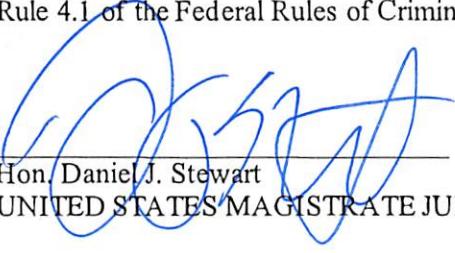
CONCLUSION

14. Based upon the above information, I believe probable cause exists that WOODWORTH has violated Title 18, United States Code, Section 2422(b), which prohibits any person from using a facility of interstate commerce to attempt to persuade, induce, entice, and coerce an individual who has not attained the age of 18 years, to engage in sexual activity for which any person can be charged with a criminal offense, that is: offenses under Articles 130 and 230 of the New York State Penal Law including Section 130.35, Rape in the First Degree. I therefore request that a criminal complaint and arrest warrant be issued pursuant to this violation of federal law.



TFo
Michelle Crandall
Task Force Officer
FBI

I, the Honorable Daniel J. Stewart, United States Magistrate Judge, hereby acknowledge that this affidavit was attested to by the affiant by telephone on September 29, 2022 in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.



Hon. Daniel J. Stewart
UNITED STATES MAGISTRATE JUDGE